

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**DERRICK WEST, ON BEHALF OF
HIMSELF AND ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

V.

**POT-O-GOLD RENTALS, LLC AND
DENNIS FLYNN, INDIVIDUALLY,**

Defendants.



CIVIL ACTION 4:25-cv-559

DEFENDANTS' MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL

Defendants **POT-O-GOLD RENTALS, LLC** and **DENNIS FLYNN, INDIVIDUALLY**, (“Defendants”) file this Motion for Withdrawal and Substitution of Counsel, and in support thereof, would show the Court the following:

I. REQUEST FOR SUBSTITUTION

1. Antonio Ramirez initially appeared as counsel of record on behalf of the Defendants.
2. Antonio Ramirez is withdrawing from this matter.
3. Defendants continue to be represented by Carmen Jo Rejda-Ponce and Tiffany Pham, and is now also represented by Sean O. Braun, who is a member of good standing with this Court.
4. This motion is not sought for purposes of prejudice or delay, but to clarify the record concerning representation and to ensure proper notice is delivered to Defendants' counsel of record.

II. PRAYER

For these reasons, Defendants ask the Court to grant its motion for withdrawal and to substitute counsel and issue an Order authorizing attorney Sean O. Braun to be substituted in place of Antonio Ramirez as Defendants' counsel in this case.

Respectfully submitted,

By: 

Carmen-Jo Rejda Ponce-Attorney-in-Charge

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Antonio Ramirez, III-Of Counsel

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Sean O Braun-Of Counsel

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COUNSEL FOR DEFENDANTS

POT-O-GOLD RENTALS, LLC AND

DENNIS FLYNN, INDIVIDUALLY

CERTIFICATE OF CONFERENCE

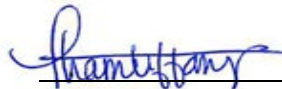
I hereby certify that I have given my consent to the filing of this motion to have me withdrawn as attorney for Defendant.

A handwritten signature in blue ink, appearing to read "Antonio Ramirez", is written above a horizontal line.

Antonio Ramirez
Fed. ID No. 3515678

CERTIFICATE OF CONFERENCE

The undersigned certifies that I conferred with Plaintiff's counsel via email on April 16, 2025, and Plaintiff is unopposed to the relief sought in this Motion.

A handwritten signature in blue ink, appearing to read "Tiffany U. Pham", is written above a horizontal line.

Tiffany U. Pham

CERTIFICATE OF SERVICE

I certify that on the 21st day of April, 2025, a copy of the foregoing document was filed was electronically filed on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on all counsel of record pursuant to the Federal Rules of Civil Procedure.

A handwritten signature in blue ink, appearing to read "Tiffany U. Pham", is written above a horizontal line.

Tiffany U. Pham

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**DEFENDANTS' ORDER GRANTING THEIR
MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

The Court considered Defendants' Motion to Withdraw and Substitute Counsel and finds that the Motion should be granted.

Therefore, it is ORDERED, that the Motion to Withdraw and Substitute Counsel is GRANTED. Sean O. Braun is hereby substituted as Counsel for Defendant, and Antonio Ramirez is removed as counsel of record for Defendant.

SIGNED this day of , 2025.

UNITED STATES DISTRICT JUDGE